

From: "Paul A. Woodard" <[paw@connorsllp.com](mailto:paw@connorsllp.com)>  
Date: 10/18/16 5:00 PM (GMT-05:00)  
To: Seth Andrews <[sandrews@kennethhiller.com](mailto:sandrews@kennethhiller.com)>  
Subject: Wagner v. Chiari & Ilecki

Seth,

Further to my voicemail, I enclose a notice for your deposition in connection with the above matter. At your convenience, please contact me regarding whether you require a subpoena and to discuss this matter further.

Best regards,

Paul

--

Paul A. Woodard

Connors LLP

1000 Liberty Building

Buffalo, NY 14202

716-852-5533 (Phone)

716-852-5649 (Fax)

[paw@connorsllp.com](mailto:paw@connorsllp.com)

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***Attorneys At Law***

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October 18, 2016

**Via First-Class Mail & Email**

Seth J. Andrews, Esq.  
The Law Offices of Kenneth Hiller  
6000 North Bailey Avenue, Suite 1A  
Amherst, New York 14226

Re: Wagner v. Chiari & Ilecki, LLP

***Paralegals***

Susan B. Fischer, R.N.  
Curtis J. Ahrens, Jr.  
John P. Kromer  
Sara E. Lyons  
Christine A. Trojan, R.N.  
Katherine M. Rusch  
Margaret Dickey, R.N.  
Julie Scott, L.P.N.  
Stephanie M. Haberl, R.N.

Dear Mr. Andrews:

On behalf of defendant, Chiari & Ilecki, LLP, I enclose a notice of your deposition in connection with the above matter. At your convenience, please contact me to discuss this matter further.

Very truly yours,

A handwritten signature in cursive script that reads 'Paul A. Woodard'.

Paul A. Woodard

*\* Also admitted in  
District of Columbia*

PAW/klw  
Enclosure

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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WILLIAM J. WAGNER,

Plaintiff,

-vs-

Docket No. 15-cv-633-FPG

CHIARI & ILECKI, LLP,

Defendant.

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**NOTICE OF DEPOSITION**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, the testimony upon oral examination of SETH J. ANDREWS, ESQ., 6000 North Bailey Avenue, Suite 1A, Buffalo, New York 14226, shall be taken by stenographic means on November 8, 2016, at 10:00 a.m., at the law offices of Connors LLP, 1000 Liberty Building, Buffalo, New York 14202, with respect to matter material and necessary to the defense of this action.

DATED: Buffalo, New York  
October 18, 2016



Terrence M. Connors, Esq.

Paul A. Woodard, Esq.

**CONNORS LLP**

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